

EXHIBIT 2

BUTLER | SNOW

June 13, 2013

VIA E-MAIL

Bryan Aylstock, Esq.
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17 E. Main Street, Suite 200 (32502)
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Pensacola, Florida 32591

RE: *In re: Ethicon, Inc. Pelvic Repair System, Products Liability Litigation,*
MDL No. 2327

Dear Bryan:

I am writing concerning your request for a hearing date on Plaintiffs' pending motion to compel. I have a proposal that I hope will resolve the issues between the parties and prevent the Court from having to be further burdened with these issues.

First, I understand and appreciate the issues you raise with respect to the objections raised in response to the requests for production of documents. While we stand by our prior responses, in the spirit of compromise, we have gone back and taken another look at them and we have significantly reduced our objections, particularly those that you term as "boilerplate." We will be sending you those supplemental responses tomorrow.

I hope that these substantially revised responses address your concerns. If you have issues with the objections that we do continue to assert (and there are not many), we would be glad to go through them one by one with you to hopefully resolve any remaining differences.

I have also reviewed the specific items that you raise in your rebuttal, including the issues relating to IFUs, patient brochures, professional education materials, SOPs and registries. I know we have written you on each of these issues and I assure you that we have expended tremendous resources to provide you with the materials that we have. Nevertheless, we will be glad to sit down with you to try to resolve these issues.

I also understand that you still have questions about these areas. Rather than continue to exchange e-mails and letters, I propose that each side nominate several people to sit down in person and specifically discuss the issues until we reach a resolution, or we have our remaining differences crystalized. In some cases, I also think that we need to have your technical people talk with our technical people, particularly in the area of SOPs as we suggested in our May 22, 2013 letter. Please let me know your team's availability and we will get this done.

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June 13, 2013

Page 2

I hope that this proposal will obviate the need for a hearing at this point. If there are still issues that we cannot resolve as a result of this process, then we could reach out to the Court at that point.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC

A handwritten signature in black ink, appearing to read "Christy D. Jones", with a stylized flourish at the end.

Christy D. Jones

CDJ:fsw

cc: Tom P. Cartmell
D. Renee Baggett

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